

Daniel S. Mount, Esq. (Cal. Bar No. 77517)
Kathryn G. Spelman, Esq. (Cal. Bar No. 154512)
Daniel H. Fingerman, Esq. (Cal. Bar No. 229683)
Kevin M. Pasquinnelli, Esq. (Cal. Bar No. 246985)
Mount & Stoelker, P.C.
RiverPark Tower, Suite 1650
333 West San Carlos Street
San Jose CA 95110-2740
Phone: (408) 279-7000
Fax: (408) 998-1473
Email: dmount@mount.com
kspelman@mount.com
dfingerman@mount.com
kpasquinnelli@mount.com

Attorneys for Defendants Romi Mayder, Wesley Mayder,
Silicon Test Systems Inc., and Silicon Test Solutions LLC

United States District Court
Northern District of California, San Jose Division

VERIGY U.S. INC., a Delaware corporation

Plaintiff,

VS.

ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual;
SILICON TEST SYSTEMS INC., a
California corporation; SILICON TEST
SOLUTIONS LLC, a California limited
liability corporation,

Defendants.

Case No. 5:07-cv-04330 (RMW) (HRL)

Defendants' Administrative Motion For Leave To File Documents Under Seal

Judge: Hon. Howard R. Lloyd

MOUNT & STOELKER, P.C.
RIVERPARK TOWER, SUITE 1650
333 WEST SAN CARLOS STREET
SAN JOSE, CALIFORNIA 95110-2740
TELEPHONE (408) 279-7000

Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Defendants request that portions of the document entitled *Defendants' Notice of Motion and Motion to Compel Amended Responses and Production of Responsive Documents to Defendants Second Set of Requests for Production of Documents on Plaintiff Verigy, Motion for Fees and Sanctions*; and exhibits A, B, C, and J to the *Declaration of Kevin M. Pasquinelli in Support of Defendant's Motion to Compel Production of Responsive Documents* be filed under seal because they contain information that has been designated as confidential or highly confidential under the Stipulated Protective Order entered by this court on August 29, 2007.

These documents contain information that has been designated "Confidential" or "Highly Confidential — Attorneys' Eyes Only" by one or more parties under the Stipulated Protective Order. Although Defendants reserve the right to challenge the designation of certain material by Verigy, information in these materials has been designated as protected from disclosure under the Stipulated Protective Order at the present time. Defendants rely on that information in support of its motion to compel production of responsive documents. The parties' confidentiality interest therefore overcomes the right of public access to the record, as a substantial probability exists that the parties' overriding confidentiality interests will be prejudiced if the record is not sealed. Further, the proposed sealing is narrowly tailored, and no less-restrictive means exist to achieve the parties' overriding interests.

The Defendants therefore lodge the above-identified materials with this court pursuant to Civil Local Rule 79-5(b) and 79-5(c) and request leave to file the aforementioned documents under seal.

Dated: April 9, 2008

Mount & Stoelker, P.C.
Kevin M. Pasquinelli

/s/

Attorneys for Defendants Romi Mayder, Wesley Mayder,
Silicon Test Systems Inc., and Silicon Test Solutions LLC

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